

Ken McLaughlin

From: Ken McLaughlin
Sent: Wednesday, December 8, 2021 5:06 PM
To: Henry Willett; Garfield Goodrum
Cc: Larry Laubscher; Ashley Schmitz
Subject: RE: Emerson Creek Pottery v. Countryview

I think that's fine. I'm working through these myself, so it's just a matter of man-hours needed. I would say production by Friday, just to give me a little breathing room in case I get derailed by a call. Many of the emails are duplicative, but I will produce them nonetheless. I will be producing, over objection due to relevancy, certain emails related to wedding inquiries, but I have to redact certain personally identifying information. I will also be producing some screenshots and PDFs of ads, but again I think they are duplicative.

The only additional person who might have relevant information is their employee, Karla, but from what I can tell, she was simply a conduit of information to Lindsay and Jonathan, who did all the work (which you've already seen). Let me know if you want to depose her.

Ken

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From: Henry Willett <hwillett@cblaw.com>
Sent: Wednesday, December 8, 2021 4:54 PM
To: Ken McLaughlin <kmclaughlin@ma-lawpc.com>; Garfield Goodrum <garfield.goodrum@gdrmlaw.net>
Cc: Larry Laubscher <LLaubscher@laubscherlaw.com>; Ashley Schmitz <ASchmitz@cblaw.com>
Subject: RE: Emerson Creek Pottery v. Countryview

Ken,

I suggest that we let Judge Ballou know that some emails have been located and that you plan on producing them by the close of business tomorrow (or whenever you think you will). Accordingly, we suggest pushing back the date for the motion to compel to next Wednesday, so that hopefully the issues to be presented can be narrowed.

If this works, I suggest that we send out a joint email to Judge Ballou tonight. Please let us know if this works.

I will defer to Garfield to respond regarding settlement.

Thanks,
Henry



From: Ken McLaughlin <kmclaughlin@ma-lawpc.com>
Sent: Wednesday, December 8, 2021 3:16 PM
To: Henry Willett <hwillett@cblaw.com>; Garfield Goodrum <garfield.goodrum@gdrmlaw.net>
Cc: Larry Laubscher <LLaubscher@laubscherlaw.com>
Subject: [EXTERNAL SENDER, USE CAUTION] Emerson Creek Pottery v. Countryview

Henry and Garfield,

As discussed before, your discovery did not request emails, but nonetheless, they were not deleted. As explained, the migration of emails has caused its share of technical issues in retrieving what otherwise should have been a relatively simple task. Through some significant efforts, our clients were able to retrieve the last few years of emails. I have a few thousand, but many are not relevant to this litigation. I am working on culling the relevant emails and saving them as PDFs so they can be Bates stamped. My goal is to have these produced tomorrow. While I do not believe they necessarily help your cause, they will nonetheless be produced.

Once you have them, it seems in everyone's best interest to at least have some sort of settlement discussion.

Ken

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